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HON. WHITMAN L. HOLT

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WASHINGTON**

In re:

EASTERDAY RANCHES,  
INC.,

Debtor.

Case No. 21-00141 WLH11

**OBJECTION TO EMERGENCY  
MOTION FOR INTERIM AND FINAL  
ORDERS AUTHORIZING DEBTOR  
TO USE CASH COLLATERAL**

The Acting United States Trustee objects to certain portions of the emergency motion for use of cash collateral for the following reasons:

1. Funding Independent Directors Fees: In the budget is a line item for Director's Fees of \$60,000. There is no showing that the funding of directors' fees is urgent or its failure will result in any immediate and irreparable harm to the estate.

2. Segregated Account for Professional Fees: There is no showing that the funding of any professional fees is urgent or its failure will result in any immediate and irreparable harm to the estate. From documents found in the state court motions for the appointment of a receiver, debtor's counsel appears holds a significant retainer from the pre-petition sale of the North Feedlot proceeds (as

**OBJECTION TO EMERGENCY MOTION  
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1 does Paladin Management Group).

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3 3. Narrow scope of the Segregated Funds for Professional Fees: The  
4 motion in 10.f indicates the fund would only be used to pay professional hired by  
5 the debtor and the Committee. This should not be restricted but be available for  
6 any equivalent claim holder in the class of administrative expenses. Nor should its  
7 beneficiaries be restricted if the case becomes administratively insolvent.

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9 Wherefore, the court is respectfully requested to deny these provisions of the  
10 motion, and for such other relief as the court may deem just under the  
11 circumstances of this case.

12  
13 Dated: February 2, 2021

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15 Respectfully submitted,

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17 /s/ Gary W. Dyer  
18 Gary W. Dyer  
19 Assistant US Trustee  
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